



IN THE UNITED STATES DISTRICT COURT

For the Southern District of California

SECURITIES AND EXCHANGE
COMMISSION
Plaintiff,

v.

JAMES E. FRANKLIN,
Defendant.

Case No. 02cv84 DMS (RBB)

**NOTICE OF REPLY IN SUPPORT OF MOTION FOR RELIEF FROM FINAL
JUDGMENT AND PENNY STOCK BAR PURSUANT TO RULE 60(b)**

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

1. This Reply addresses the Securities and Exchange Commission's opposition and demonstrates that the new evidence, changes in controlling law, and extraordinary equitable circumstances justify relief under Federal Rule of Civil Procedure 60(b)(2), (3), and (6). The hearing is scheduled before the Honorable Chief Judge Dana M. Sabraw on **June 18, 2025, at 1:30 PM** in Courtroom 1A of the United States District Court, Southern District of California, located at 333 West Broadway, San Diego, California.
2. This motion is based on the attached Memorandum of Points and Authorities, Declaration of James E. Franklin, all exhibits, and records on file in this case, and any oral argument the Court may permit.

Dated: June 10, 2025

Respectfully submitted,

James E. Franklin

James E. Franklin
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